

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

<b>IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>  <b>HON. ROBERT B. KUGLER</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	

**NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION**

TO: **Victoria Lockard, Esq.**  
**Greenberg Traurig, LLP**  
**333 Piedmont Road NE, Suite 2500**  
**Atlanta, GA 30305**

*Attorneys for Defendants*

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition via Zoom, of Roger Williams, on February 17, 2022, at 7:00 a.m. Pacific time, and continuing until completion, at Greenberg Traurig, LLP, 4 Embarcadero Center, Suite 3000, San Francisco, CA 94111, via Zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The witness shall produce the documents requested at Exhibit A, attached hereto, at least two days in advance of the deposition, to the extent not already served upon Plaintiffs.

**TAKING ATTORNEY FOR PLAINTIFFS:**

David J. Stanoch  
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The videotaped deposition will be taken via Zoom before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

February 9, 2021

**PLAINTIFFS' COUNSEL**

By: /s/ David J. Stanoch  
David J. Stanoch  
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**EXHIBIT A**

**DOCUMENT REQUESTS**

1. Copies of all invoices for work performed in connection with any consultation or expert work performed for or on behalf of any defendant or their counsel with regard to any issues in this MDL, including but not limited to for the review of documents, review and consultation with regard to plaintiff experts, preparation of Dr. Williams's report, and preparation for deposition or trial.
2. Any notes, i.e. written or electronic, reflecting consulting or litigation work that has not been documented in invoices.
3. All documents relating to any remuneration you have received from any manufacturer, distributor, or retailer of pharmaceutical drugs.
4. Any articles, presentations, seminars, classes, or other similar documents (including PowerPoint-type slides) authored or used by Dr. Williams with regard to USP monographs, the Orange Book, RLDs, NDAs, aNDAs, DMF, hypertension, treatments for hypertension, ARBs, adulteration, misbranding of drug products.
5. Any articles, presentations, seminars, classes or other similar documents (including PowerPoint-type slides) authored by Dr. Williams and any aspect of FDA regulatory compliance for pharmaceutical drugs, including but not limited to cGMP compliance.
6. All documents concerning Dr. Williams' work with the USPC.
7. Copies of any documents or articles relied upon for the opinions set forth in the report served, if not listed in the report.
8. Copies of any documents or articles reviewed in connection with the report served, whether or not listed in the report or attachments thereto.
9. All documents reflecting any communications with patients concerning valsartan (you may redact patient identifiers and unrelated HIPAA-protected information)
10. Copies of all Publications and Presentations listed in Dr. Williams's CV, which is Exhibit A to his Expert Report, and any updated CV or testimony list.
11. Any illustrations, PowerPoints, images, charts, tables or demonstrative exhibits that may be used by or with Dr. Williams in connection with a Daubert hearing or trial testimony in this litigation.

12. Documentation of any prior work Dr. Williams has done as a consultant for any of the Defendants in this action.
13. All documents reflecting valsartan or any other drug recalls relating to nitrosamines that you received, reviewed, or sent.
14. Any documents or other communications the witness has received from any person or entity with regard to nitrosamine impurities in any angiotensin II receptor blocker or other drug, outside of information provided by counsel who retained the witness.
15. Any communications from the witness to any person or entity with regard to nitrosamine impurities in any angiotensin II receptor blocker or other drug, outside of communications to counsel who retained the witness.
16. Any textbook referenced by the witness in forming his opinions.
17. All documents relating to any pharmacy benefit on you consulted, including identity of entities and persons with whom you consulted.
18. All documents relating to any work you performed on behalf of any P&T Committee.
19. Copies of all transcripts of testimony under oath given by Dr. Williams in the last 10 years.
20. Copies of all guidance on which Dr. Williams worked while at the FDA.
21. Copies of all transcripts of any FDA-sponsored (or co-sponsored) symposia, roundtables, or other meetings (public or private) in which Dr. Williams participated.

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 9, 2022, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

**PLAINTIFFS' COUNSEL**

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